

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

DARIUS F. QUEEN # 305-181,

*

Plaintiff,

*

v.

*

Civil No. WDQ-02-3885

H.D. WARD

*

Defendant.

*

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* * * * *

CONSENT MOTION FOR EXTENSION OF TIME

Defendant, H. D. Ward, by his attorneys, J. Joseph Curran, Jr., Attorney General of Maryland, and Phillip M. Pickus, Assistant Attorney General, moves to extend the time in this Court's Scheduling Order for the filing of motions to and including November 8, 2004 for the following reasons:

1. Pursuant to this Court's Order dated May 25, 2004, the motions deadline in this case is October 8, 2004.

2. Pursuant to this Court's Order dated September 8, 2004, the discovery deadline in this case was extended to September 16, 2004.

3. The fourth and final deposition in this case occurred on September 9, 2004. Undersigned counsel has just recently received the transcripts for the depositions that occurred in this case. These transcripts will be used in defendant's forthcoming motion.

4. An additional thirty day period to and including November 8, 2004 should be sufficient to prepare defendant's dispositive motion.

5. Undersigned counsel has spoken to plaintiff's counsel, Paul Caiola, Esq., via the telephone on October 8, 2004 and Mr. Caiola indicates he consents to this motion.

WHEREFORE, it is respectfully requested that this Court grant leave for Defendant to file a motion in the instant case on or before November 8, 2004.

Respectfully submitted,

J. JOSEPH CURRAN, JR.
Attorney General of Maryland

/s/
Phillip M. Pickus
Assistant Attorney General
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* * * * *

ORDER

Upon consideration of the foregoing Motion for Extension of Time, it is this
____ day of _____, 2004, by the United States District Court for
the District of Maryland,

ORDERED, that the time for defendant, H.D. Ward, to file a dispositive motion
is hereby extended to and including November 8, 2004.

Judge William D. Quarles, Jr.
United States District Judge

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